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**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF MARYLAND  
 NORTHERN DIVISION**

4:41 pm, May 21 2024

AT BALTIMORE  
 CLERK, U.S. DISTRICT COURT  
 DISTRICT OF MARYLAND  
 BY R.C. Deputy

**UNITED STATES OF AMERICA,**

**v.**

**No. SAG-21-cr-0090**

**WAYNE I. KACHER, JR.,**

**Defendant**

**DEFENSE EXHIBIT LIST**

<b>Exhibit #</b>	<b>Description</b>	<b>Identified</b>	<b>Admitted</b>
300	<i>Intentionally Left Blank</i>		
301	Jan 10 - March 14, 2014 emails	5/14/24	5/14/24
302	June 25, 2014 email		
303	September 23, 2014 email	5/14/24	5/14/24
304	April 21, 2014 email	5/14/24	5/14/24
305	November 18, 2014 email	5/14/24	5/14/24
306	September 9, 2014 email		
307	December 10, 2014 email		
308	September 5, 2014 Email and Final Draft Bay Crossing Contract	5/14/24	5/14/24
309	January 11, 2016 MdBC Letter		
310	January 28, 2016 email	5/20/24	5/20/24
311	September 2, 2016 Amendment Contract N00421-08-2-0001	5/14/24	5/14/24
312	August 13, 2018 email		
313	Chart Summary BAU of Income	5/16/24	5/16/24
314	Chart Tracing August 1, 2014 payment – G Ex 204	5/16/24	5/16/24
315	Chart Tracing October 31, 2014 payment – G Ex 208	5/16/24	5/16/24
316	Chart Tracing December 11, 2014 payment G Ex 211	5/16/24	5/16/24

<b>Exhibit #</b>	<b>Description</b>	<b>Identified</b>	<b>Admitted</b>
317	Chart BAU October 17, 2016 payment – G Ex 213	5/16/24	5/16/24
318	Chart BAU of payments – G Ex 214	5/16/24	5/16/24
318-A	Chart April 21, 2017 payment	5/16/24	5/16/24
319	Chart October 17, 2016 payment – G Ex 215		
320	Taylors Island Folder	5/14/24	5/14/24
320-A	July 31, 2014 BAU lump sum pricing Cambridge	5/14/24	5/14/24
321	Bay Approach Folder	5/14/24	5/14/24
321-A	September 17, 2014 BAU lump sum pricing Bay Crossing	5/14/24	5/14/24
321-B	September 26, 2017 email BAU proposal Bay Approach	5/14/24	5/14/24
322	Cove Point Folder	5/14/24	5/14/24
323-A	September 17, 2014 BAU lump sum pricing Bay crossing	5/14/24	5/14/24
323-B	September 26, 2017 email BAU proposal Western shore	5/14/24	5/14/24
324	Indian Head Folder	5/14/24	5/14/24
324-A	March 11, 2016 BAU lump sum pricing Indian Head	5/14/24	5/14/24
325	Route 404 Relocation Folder	5/14/24	5/14/24
325-A	March 30, 2016 BAU Estimate	5/14/24	5/14/24
326	September 2014 BAU checks	5/14/24	5/14/24
326-A	Feb – March 2015 BAU checks	5/14/24	5/14/24
326-B	Nov 2015 BAU checks	5/14/24	5/14/24
327	September 25, 2015 Facebook post		
328	April 27, 2016 Texts and photo		
329	June 2016 texts		
330	Facebook video		
331	March 11, 2017 Facebook post		
332	May-June 2017 texts		
333	Photo in pole barn		
334	Delmarva Power Sports documents		

<b>Exhibit #</b>	<b>Description</b>	<b>Identified</b>	<b>Admitted</b>
335	July 17, 2014 Spring Associates – mobilization	5/14/24	5/14/24
336	August 12, 2014 Spring Associates bid	5/14/24	5/14/24
337	August 13, 2014 Bay Crossing	5/14/24	5/14/24
338	December 9, 2014 Spring Associates worksheet	5/14/24	5/14/24
339	September 28, 2016 Spring Associates	5/14/24	5/14/24
340	November 18, 2016 Authority Letter for Crofton	5/14/24	5/14/24
341	December 12, 2016 Spring Associates worksheet	5/14/24	5/14/24
342	December 20, 2016 Spring Associates worksheet	5/14/24	5/14/24
343	MdBC payments to BAU	5/14/24	5/14/24
343-A	Calculation of payments	5/14/24	5/14/24
344	July 30, 2014 email and Inv #1532	5/14/24	5/14/24
345	July 30, 2014 email and Inv #1533	5/14/24	5/14/24
346	August 9, 2014 Taylors Island Invoices 1536, 1537, 1537A	5/14/24	5/14/24
346-A	Invoice calculation table	5/20/24	5/20/24
347	Note re invoiced / left to invoice	5/20/24	5/20/24
348	Route 220 Cumberland MD folder		
348-A	August 28, 2014 BAU Invoice#1544	5/14/24	5/14/24
349	Salisbury Emergency Folder	5/14/24	5/14/24
349-A	September 2, 2014 email from Kyle Richards re: Invoice #1547	5/14/24	5/14/24
350	<i>Intentionally Left Blank</i>		
351	October 5, 2014 email and invoice 1555, 1555A	5/14/24	5/14/24
352	October 29, 2014 email and invoice 1584, 1584A	5/14/24	5/14/24
352-A	Invoice calculation table	5/20/24	5/20/24
353	Note re invoiced / left	5/20/24	5/20/24
354	October 29, 2014 email and invoice 1585	5/14/24	5/14/24
355	December 11, 2014 email and invoices 1555 and 1555A	5/14/24	5/14/24
356	Email and March 30, 2016 BAU Invoice #1938	5/14/24	5/14/24

<b>Exhibit #</b>	<b>Description</b>	<b>Identified</b>	<b>Admitted</b>
357	Email and April 14, 2016 BAU Invoice #1946	5/14/24	5/14/24
358	Email and June 28, 2016 BAU Invoice #1984	5/14/24	5/14/24
359	August 23, 2016 BAU Invoice #2022	5/14/24	5/14/24
360	November 22, 2016 email from Kyle Richards Invoice #2022	5/14/24	5/14/24
360-A	Invoice calculation table	5/20/24	5/20/24
361	September 28, 2016 BAU Invoice #2045	5/14/24	5/14/24
362	April 21, 2017 BAU Invoice #2160	5/14/24	5/14/24
363	MdBC Check #4794	5/14/24	5/14/24
363-A	M&T Bank Business Certification	5/14/24	5/14/24
363-B	M&T Bank Statement BAU October 2016	5/14/24	5/14/24
364	M&T Bank Statement BAU October 2016	5/14/24	5/14/24
364-A	BAU Check October 19, 2016 Check #25314	5/14/24	5/14/24
365	First National Bank of Pennsylvania Business Certification	5/14/24	5/14/24
365-A	Bank Statement October 2016 Account ending -3009	5/14/24	5/14/24
365-B	Copy of Deposit	5/14/24	5/14/24
365-C	Copy of Debit receipt	5/14/24	5/14/24
365-D	Bank Statement May 2016 Account ending -3009	5/14/24	5/14/24
366	Ex E-4 A chart of E-1, E-2, E-3 showing source of \$21,721.50 to Eastern Shore Pole Building		
367	<b>M&amp;T Bank Business Certification</b>		
367-A	M&T Bank Statement BAU November 2016 account ending -8534	5/14/24	5/14/24
367-B	MdBC Check# 1015 November 1, 2016	5/14/24	5/14/24
367-C	Check payable to BAU	5/14/24	5/14/24
367-D	Check payable to BAU	5/14/24	5/14/24
367-E	Check payable to BAU	5/14/24	5/14/24
367-F	Check payable to BAU	5/14/24	5/14/24
367-G	Check payable to BAU	5/14/24	5/14/24
367-H	MdBC Check to BAU November 23, 2015 Check #1025	5/14/24	5/14/24

<b>Exhibit #</b>	<b>Description</b>	<b>Identified</b>	<b>Admitted</b>
368	M&T Bank Statement BAU November 2016 account ending -9065	5/14/24	5/14/24
368-A	Check payable to BAU	5/14/24	5/14/24
368-B	Check payable to BAU	5/14/24	5/14/24
368-C	MdBC Check to BAU November 23, 2016 Check #1023	5/14/24	5/14/24
369	First National Bank of Pennsylvania Business Certification	5/14/24	5/14/24
369-A	First National Bank of Pennsylvania Statement BAU November 2016 Account ending -4207	5/14/24	5/14/24
369-B	Copy of Deposit	5/14/24	5/14/24
370	First National Bank of Pennsylvania Statement BAU November 2016 Account ending -3009	5/14/24	5/14/24
370-A	Copy of Deposit	5/14/24	5/14/24
370-B	Copy of Debits	5/14/24	5/14/24
371	First National Bank of Pennsylvania Business Certification	5/14/24	5/14/24
371-A	First National Bank of Pennsylvania Statement BAU April 2017 Account ending -4207	5/14/24	5/14/24
371-B	Copy of Deposit	5/14/24	5/14/24
371-C	Copy of Deposit	5/14/24	5/14/24
371-D	Copy of Deposit	5/14/24	5/14/24
371-E	Copy of Deposit	5/14/24	5/14/24
371-F	Copy of Deposit	5/14/24	5/14/24
371-G	Copy of Debits	5/14/24	5/14/24
372	First National Bank of Pennsylvania Statement BAU April-May 2017 Account ending -4207	5/14/24	5/14/24
372-A	Copy of Deposit	5/14/24	5/14/24
372-B	Copy of Deposit	5/14/24	5/14/24
372-C	Copy of Deposit	5/14/24	5/14/24
373	LAI Construction Invoices 8625, 8623, 8639, 8648	5/14/24	5/14/24
374	September 11, 2014 email from F. Dialoiso re: Locating		
375	November 19, 2014 email from Kacher re No Show Report		

<b>Exhibit #</b>	<b>Description</b>	<b>Identified</b>	<b>Admitted</b>
376	Pro Comm Invoices 2, 3009, 3017, 33018, 3024	5/14/24	5/14/24
377	Albers emails		
378	Feb 2 2016 Article		
379	June 2016 – Aug 2017 BAU Invoices to Whiting and Turner / FTS	5/20/24	5/20/24
380-A	Sept 22 2016 email re Pro Comm locating for Crown Castle		
380-B	May 26 2017 email Crown Castle locating		
381	Article		
381-A	Photo of Kyle Kacher holding a fish	5/20/24	5/20/24
382	Photo of group on boat	5/20/24	5/20/24

Respectfully submitted,

/s/

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